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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SEDIK KHODABAKHSH, an individual,

Plaintiff,

vs.

ALBERTSON'S, LLC d/b/a ALBERTSON'S;
a Foreign Limited Liability Company; and
DOES I-V and ROE CORPORATIONS VI-X;
inclusive,

Defendants.

CASE NO.: 2:25-cv-450-JAD-NJK

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE
WITH LR 26-1(B)**

Pursuant to Local Rules 26-1(b), the parties respectfully submit the following stipulated discovery plan and jointly request that the Court: 1) approve this plan, and 2) implement the plan as a scheduling order. The FRCP 26(f) conference was held on March 25, 2025, by CRAIG W. DRUMMOND, ESQ., for Plaintiff, SEDIK KHODABAKHSH, and RYAN VENCI, ESQ., for Defendant, ALBERTSON'S, LLC. The parties propose the following discovery plan:

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5. Dispositive Motions (LR 26-1(b)(4)):

The deadline for filing dispositive motions shall be thirty (30) days after the close of discovery: **Wednesday October 8, 2025.**

6. Joint Pre-Trial Order (LR 26-1(b)(5), (6)):

The joint pre-trial order shall be filed no later than thirty (30) days after the date set for filing dispositive motions: **Friday November 7, 2025.** The joint pre-trial order shall include the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them.

7. Alternative Dispute Resolution (LR 26-1(b)(7)):

Counsel for the parties certify that they met and conferred about the possibility of using alternative dispute resolution including mediation, arbitration and/or an early neutral evaluation. The parties agree that an early neutral evaluation would not be effective at this time as the parties and their counsel believe that it is necessary to conduct discovery before attempting to resolve this case. Counsel further agree that a settlement conference will be beneficial after discovery is concluded. Finally, the parties and their counsel are not interested in submitting this case to arbitration.

8. Alternative Forms of Case Disposition (LR 26-1(b)(8)):

The parties certify that they have considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01) but do not consent to those forms of dispute resolution at this time.

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9. Electronic Evidence (LR 26-1(b)(9)):

The parties certify that they have discussed and intend to use electronic evidence at the trial of this matter and will ensure that said evidence is in an electronic format compatible with the Court's electronic jury evidence display system. At present, the parties have not agreed upon any stipulations regarding use of electronic evidence but will address this issue again in the Pre-Trial Order.

DATED this 11th day of April, 2025.

DATED this 11th day of April, 2025.

BRANDON | SMERBER LAW FIRM

DRUMMOND LAW FIRM

/s/ Lew Brandon, Jr., Esq.

/s/ Craig W. Drummond, Esq.

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SEDIK KHODABKHS

Attorneys for Defendant,

ALBERTSON'S LLC

ORDER

IT IS SO ORDERED

DATED this 11th day of April, 2025.


UNITED STATES MAGISTRATE JUDGE